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August 15, 1994

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Re: CS Docket No. 94-42

Dear Gentlemen:

On August 8, 1994 this office filed "Reply Comments" CS Docket No. 94-42 on behalf of the Wichita Falls-Lawton market television broadcasters and James Cable. Some of the copies distributed to counsel in this proceeding apparently omitted the second page of the Affidavit of Scott A. Madison in Exhibit 1. The full Affidavit was, however, included in the original filed with the FCC Secretary.

To ensure that parties have a complete copy of the pleading, we are sending a full copy of Exhibit 1 to all counsel of record in this proceeding. We apologize for the inconvenience.

Sincerely,

James S. Blitz

Enclosure

cc: Mr. William F. Caton, FCC Secretary
(with Enclosure)

EXHIBIT 1

Affidavit of Scott A. Madison
Director of Engineering, James Communications Partners

Attachment 1
Attachment 2
Attachment 3
Attachment 4
Attachment 5
Attachment 6

AFFIDAVIT

State of Michigan)
) SS:
County of Oakland)

Scott A. Madison, being duly sworn, hereby deposes and says:

1. I am Director of Engineering for James Communications Partners, General Partner for James Cable Partners, L.P. ("James") and am responsible for technical compliance of its cable television operations. Prior to joining James, I was Director of Engineering for C4 Media Companies, Inc., (1988-1991), Regional Engineer for C4 Media Cable South I, L.P., (1986-1988), Field Engineer for Regency Cable Products, (1985-1986), and Technical Supervisor for Cablevision Service Company, Inc., (1981-1985). I have been employed in the cable television and communications industries since 1976 and hold a General Class FCC Commercial Radio Telephone License #PG-1-19034. I am familiar with the FCC rules relating to cable television and broadcasting, specifically including Rule §73.686 regarding signal measurements.

2. On July 7, 1994, James filed comments in CS Docket No. 94-42 relating to the possible revision of Rule §76.51 to include Decatur, Texas, in the Dallas-Fort Worth television market. James opposed this proposal because of the unfair consequences it would have on the operations of its cable television systems within the Decatur 35-mile zone. As part of its opposition, James asserted that KMPX, the Decatur television station seeking the rule change, does not serve Decatur itself with its television signal.

3. In order to test this assertion, I asked Dale Howard, the Plant Supervisor for James' Decatur, Texas system to conduct measurements in Decatur of the signal strength

of KMPX. These measurements were conducted under my supervision on July 22, 1994, in accordance with the procedures specified in FCC Rule §73.686. Specifically, a grid of horizontal and vertical lines encompassing the City of Decatur (1990 census population of 4252) were drawn on a topographical map. The 16 resulting intersection points comply with the number of points required by Rule §73.686(c). (An enlarged copy of this map is included as Attachment 1 to this affidavit). At each intersection point, measurements were taken using a 1/2λ reference dipole mounted at the 30 foot level of a pole, 40 feet of RG/6 coax, a Trilithic TriCorder field strength meter (Serial No. 105401, purchased November 3, 1993, and last calibrated on that date to an accuracy of ± .75dB at 30-110 degrees F). Those measurements are shown on Attachment 2 to this affidavit.

4. Additionally, in accordance with Rule §73.686(c)(2)(iii) four cluster measurements were taken at four of the grid intersection points. At each cluster, five radials of 200 feet were marked off, and signal measurements taken at each of the five end points. (See Attachments 3 through 6 to this affidavit).

In witness whereof, I am

Scott A. Madison

Susan L. Clem

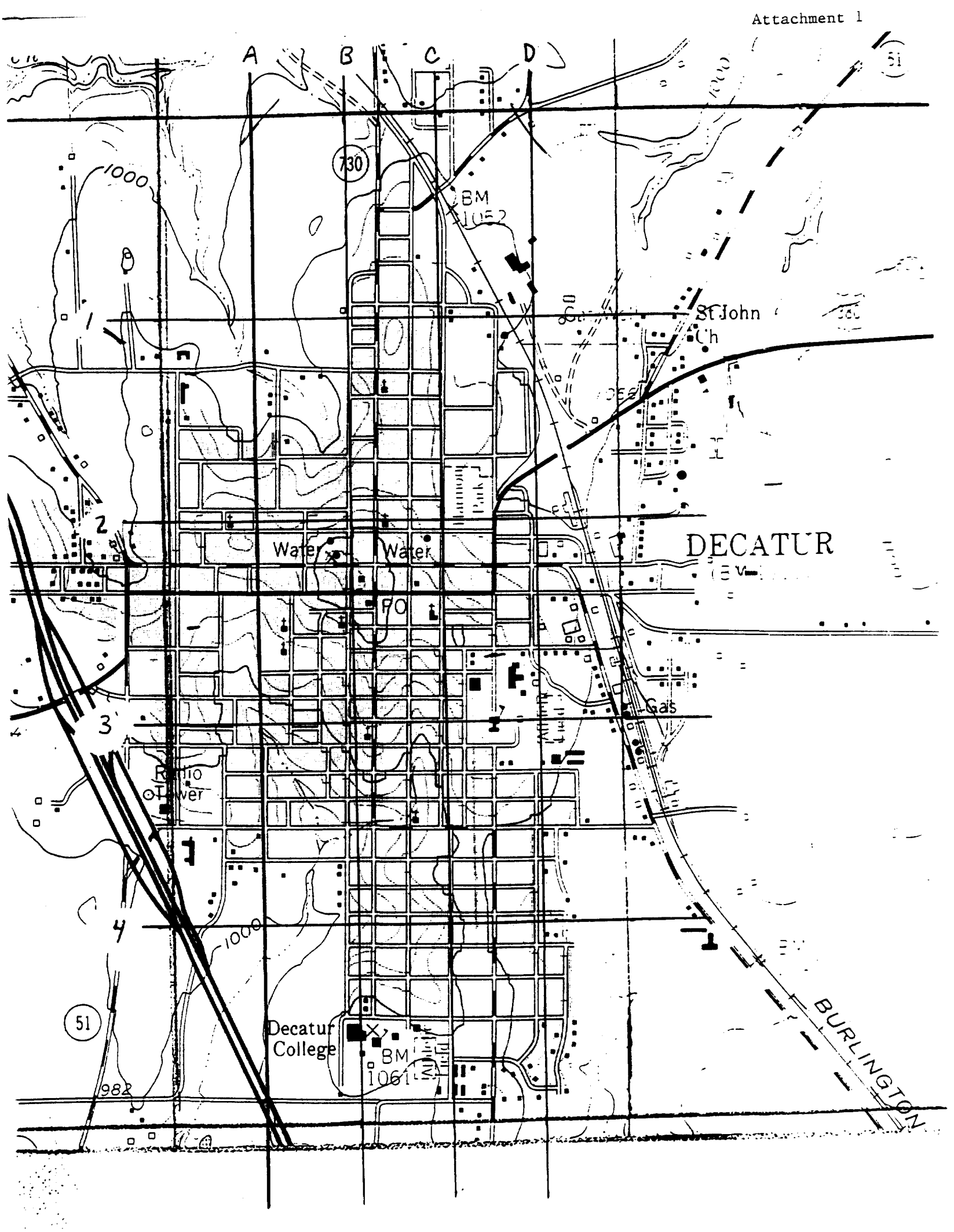
Subscribed and sworn to before me
this 5 day of August, 1994

SUSAN L. CLEM
NOTARY PUBLIC - MACOMB COUNTY, MICH.
MY COMMISSION EXPIRES [illegible]

Notary in Oakland County, Michigan

My commission expires:

Attachment 1



Attachment 2

PAGE ONE

DECATUR SIGNAL SURVEY

DATE: 07/22/94

TEST EQUIPMENT USED

1. FIELD STRENGTH METER: Trilithic Tricorder, Serial number 105401.
   The accuracy of this meter is plus or minus .75 dB AT 25 degrees centigrade and plus or minus 1.5 dB across the temperature range.

2. ANTENNA: Half Wave Dipole cut for channel 29, 561.250 MHz.

3. TEST CABLE: RG6 Coaxial Cable eighteen feet long with loss of 1 dB.

TEST PROCEDURE

Sixteen locations were established by drawing four lines East to West then North to South. The test location being at the intersection of these lines. The North to South lines were labled A, B, C, D, the East to West lines were labled 1, 2, 3, 4, . The test locations number then would be A1, A2, ETC., (SEE PAGE 2)

At each location we raised the antenna to a level thirty feet above the ground. The antenna was orientation until the strongest signal level was measured, this reading was recorded and the direction checked with a compass.

At four of the test locations we made an additional five each measurements with in a 200 foot radius. These readings were then recorded. (SEE PAGE 3)

At each test location the time, temperature and any construction located in the signal path was noted.

The signal level logged was determined by taking the signal level reading at the test site and adding to it the test cable loss in dBmV.

GRADE B MEASUREMENT DATA

ALL SIGNAL LEVEL READINGS IN dBmV.

DATE 07/22/94

TEST LOCATION	TIME	TEMP.	READING	NOTES
A1:	11:54 AM	86	-19.4	
A2:	12:00	89	-6.4	
A3:	1:58 PM	89	-17.5	Large trees in path 50 feet high 100 foot from Test Antenna.
A4:	3:02 PM	94	-15.1	Large building in path 4 blocks from test Antenna.
B1:	10:45 AM	87	-7.48	
B2:	12:07 PM	89	-5.2	Power Lines in path 50 feet from Test Antenna
B3:	1.39 PM	94	-11.8	Large Church building in path 75 feet from Test Antenna.
B4:	2:51 PM	93	-17.4	
C1:	11:00 AM	87	-11.8	
C2:	12:10 PM	89	-5.2	
C3:	2:09 PM	93	-3.8	
C4:	2:30 PM	93	-11.2	
D1:	11:30 AM	88	-8.8	
D2:	12:36 PM	89	-15.1	
D3:	2:08 PM	93	+5.3	
D4:	2:40 PM	93	-10.4	

CLUSTER MEASUREMENT

FOUR TEST LOCATIONS WERE SELECTED FOR THE CLUSTER MEASUREMENTS IN LIEU OF MOBILE RUNS.

THE SIGNAL LEVEL READINGS ARE IN dBmV.

TEST LOCATION:

01: -10.4, -8.9, -14.9, -8.9, AND -11.9 WAS MEASURED AT FIVE SPOTS WITH IN 300 FEET OF 01.

03: -3.2, -4.1, +.8, -10.4, AND -14.4 WAS MEASURED AT FIVE SPOTS WITH IN 200 FEET OF 03.

02: -3.2, -6.3, -6.2, -3.8, AND -3.2 WAS MEASURED AT FIVE SPOTS WITH IN 300 FEET OF 02.

04: -5.2, -10.4, -7.4, -8.1, AND -5.6 WAS MEASURED AT FIVE SPOTS WITH IN 200 FEET OF 04.

Grade B Measurement Data

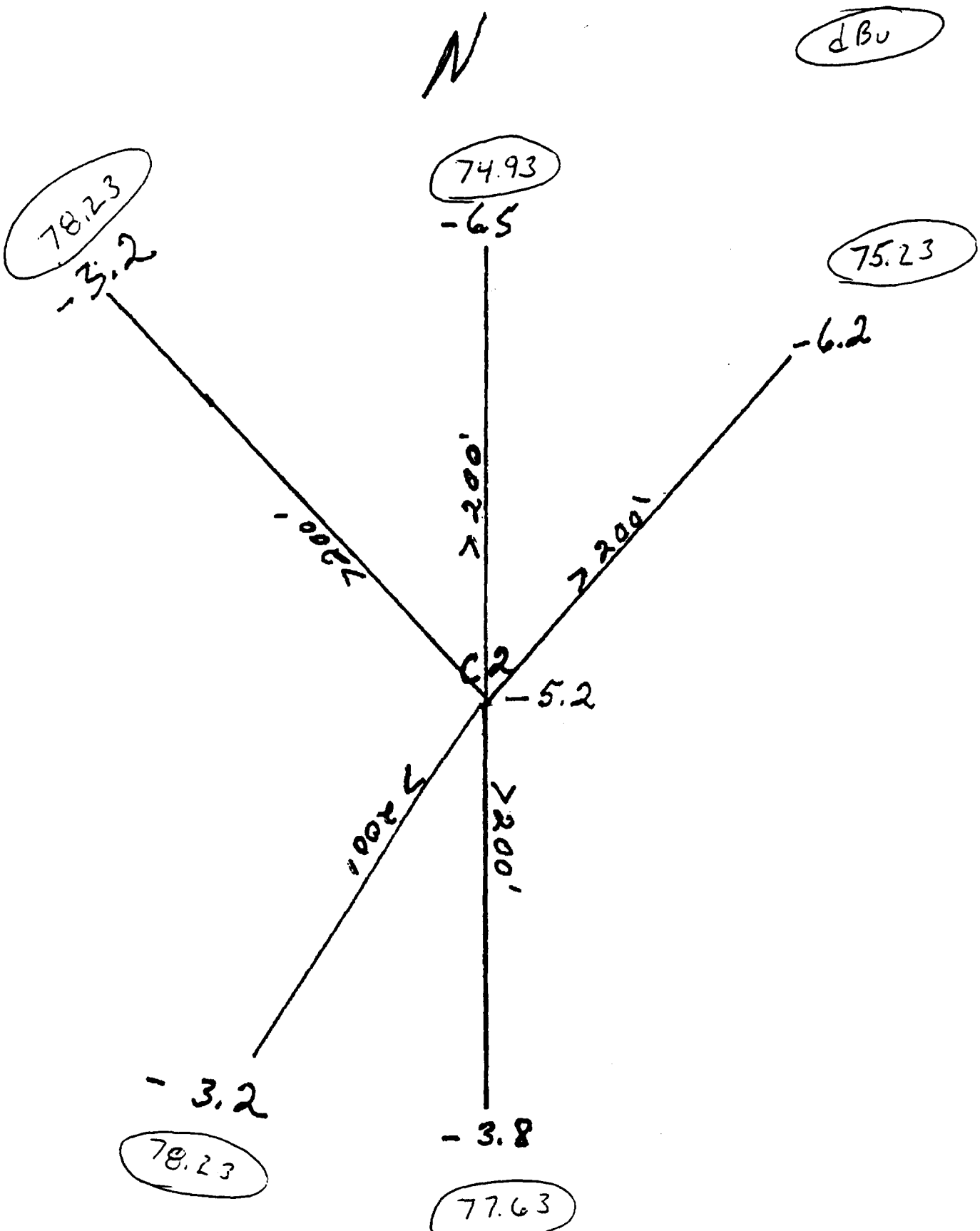
Date 07/22/94 Channel 29 Location

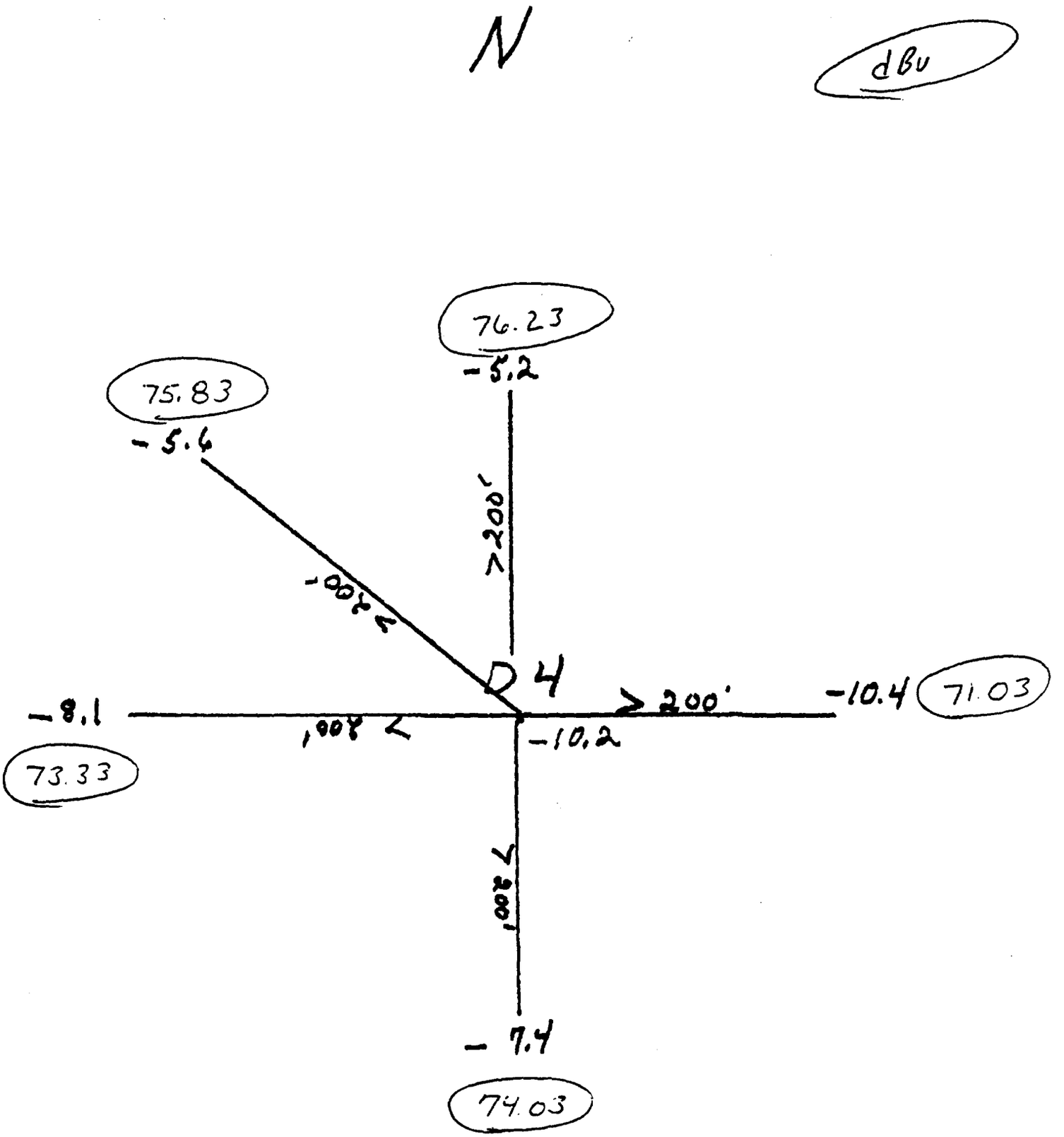
Temperature 90 Wx Conditions Partly Cloudy

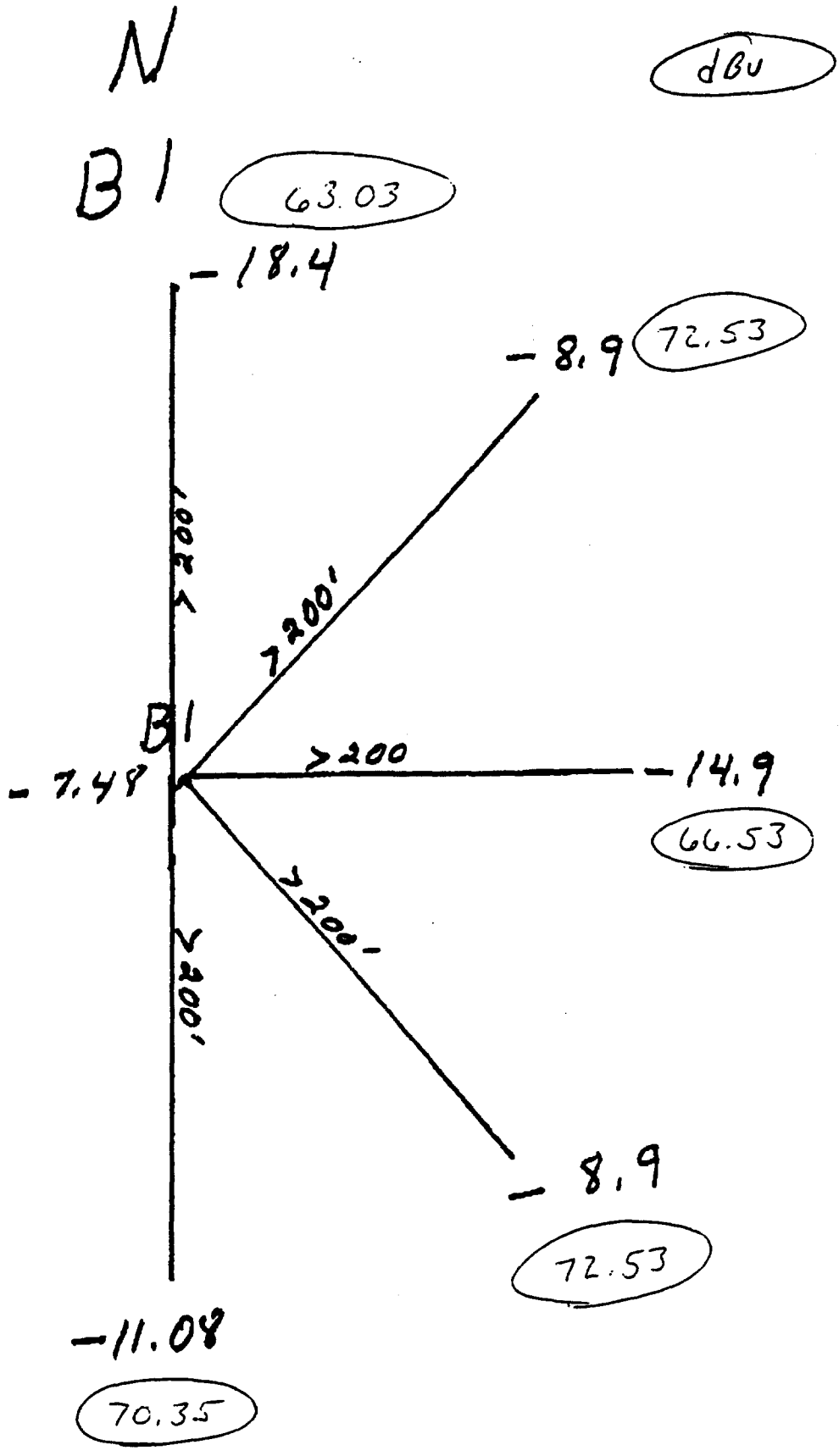
Loc	F.S.	Time	Notes (dBu)
A1	-19.4	11:54	62
A2	-6.4	12:00	75
A3	-17.5	1:58	TREES IN PATH 63.93
A4	-15.1	3:02	BUILDING IN PATH 66.33
B1	-7.48	10:45	73.95
B2	-5.2	12:07	POWER LINE IN PATH 76.23
B3	-11.8	1:39	CHURCH BUILDING IN PATH 69.63
B4	-17.4	2:51	64.03
C1	-11.88	11:00	69.63
C2	-5.2	12:13	76.23
C3	-3.8	2:09	77.63
C4	-10.2	2:30	71.23
D1	-8.8	11:30	72.63
D2	-15.1	12:36	66.33
D3	+6.3	2:08	87.73
D4	-10.2	2:40	71.23

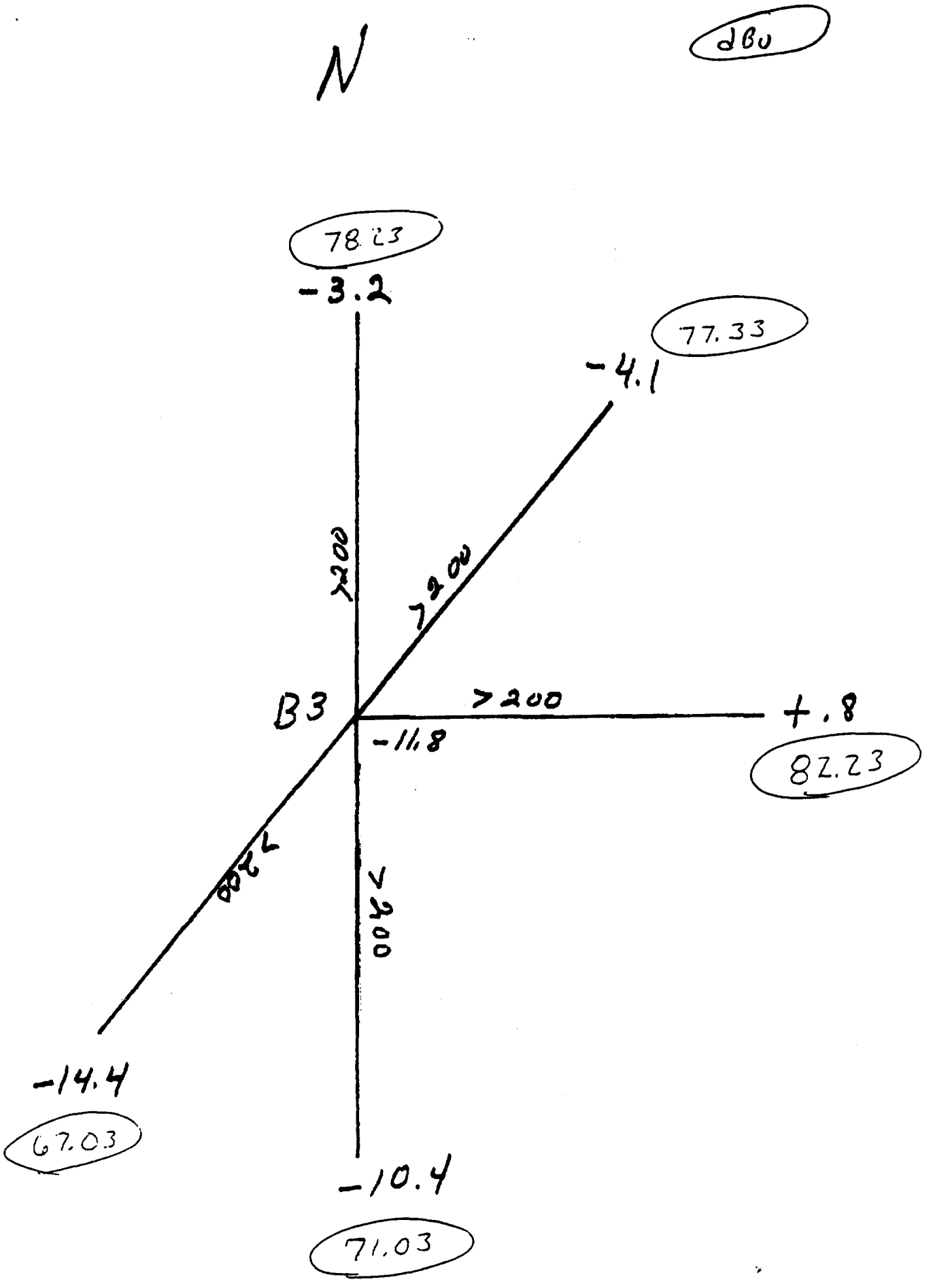
List test equipment, including manufacturer, type, serial number, rated accuracy, date of last calibration:

Equipment was New Trilithic TriCorder FSM, 30' Mast, Dipole Antenna Cut to Channel 29, 40' RG/6 COAX.


N
dBu
74.93
-6.5
78.23
-3.2
75.23
-6.2
1200'
1200'
1200'
1200'
-5.2
-3.2
-3.8
78.23
77.63


N
dBu
76.23
-5.2
75.83
-5.4
>200'
<200'
D 4
-8.1
<100'
>200'
-10.4
71.03
-10.2
73.33
<100'
-7.4
74.03


N
dBU
B1
63.03
-18.4
-8.9
72.53
>200'
>200'
B1
-7.48
>200
-14.9
66.53
>200'
>200'
-8.9
72.53
-11.08
70.35


N
dBu
78.23
-3.2
77.33
-4.1
>200
>200
B3
>200
+.8
-11.8
82.23
>200
>200
-14.4
67.03
-10.4
71.03